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                          UNITED STATES DISTRICT COURT
13
                                DISTRICT OF NEVADA
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    BRIAN C. TANKO, Ltd; BRIAN
                                               CASE NO: 2:11-cv-02073-GMN-GWF
    TANKO, and VICTORIA TANKO,
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                        Plaintiffs,
16
                                               DEFENDANTS' JOINT
    v.
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                                               UNOPPOSED MOTION FOR
                                               EXTENSION OF TIME TO
    PACIFIC LIFE INSURANCE
18
    COMPANY; CBZ RETIREMENT
                                               RESPOND TO COMPLAINT
    SOLUTIONS, LLC; CORY ZIMET;
19
                                               (THIRD REQUEST)
    ECONOMIC CONCEPTS, INC.; ECI
    PENSION SERVICES, LLC
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    MEDALIST PENSION ADVISORS,
    LLC; PENSION STRATEGIES, IBP
21
    LLC, and KENNETH R. HARSTEIN,
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                      Defendants
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                Defendants move the Court for an extension of time to respond to
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Plaintiffs' complaint up to and including March 15, 2012 pursuant to LR 6-1. This is the third extension requested concerning this matter. Plaintiffs' counsel has informed Pacific Life's counsel that there is no opposition to this request and that it would extend to the other served defendants to this cause.

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1 On November 14, 2011, Plaintiffs commenced this action by filing a 2 complaint in the Eighth Judicial District Court, Clark County, Nevada. On December 22, 2011, Pacific Life removed this action to federal court and all other 3 defendants consented to the removal. The parties have since conferred in good 4 faith and are presently discussing the potential for an early resolution of this 5 matter. 6 7 This request for an extension is made in good faith and not made for the purpose of undue delay. Therefore, the Defendants respectfully request that 8 9 the Court grant its motion.. 10 Respectfully submitted: 11 LOVAAS & LEHTINEN, P.C. MORRIS PETERSON 12 By: /s/ Rex D. Garner Robert McCoy, Bar No. 9121 By:/s/ Aaron D. Lovaas 13 Aaron D. Lovaas, Bar No. 5701 6128 West Sahara Avenue Rex D. Garner, Bar No. 9401 14 300 South Fourth Street, Ste. 900 Las Vegas, Nevada 89146 Las Vegas, Nevada 89101 15 Attorney for Pension Strategies, IBP, Attorneys for Defendant Pacific Life LLC 16 Insurance Company 17 WILSON ELSER 18 By:/s/David Kahn 19 David Kahn, Bar No. 7038 300 South Fourth Street, 11th Floor 20 Las Vegas, Nevada 89101 21 Attorney for Defendants Economic Concepts, Inc.; ECI Pension Services, 22 LLC; Medalist Pension Advisors, LLC and Kenneth R. Harstein 23 **ORDER** 24 It is so ordered. All served Defendants shall have up to and including 25 March 15, 2012 to answer or otherwise respond to the Complaint. 26 Dated: February <u>15</u>, 2012. 27 UNITED STATES MAGISTRATE JUDGE 28

MORRIS PETERSON ATTORNEYS AT LAW 900 BANK OF AMERICA PLAZA 300 SOUTH FOURTH STREET LAS VEGAS, NEVADA 89101 702/474-9400 FAX 702/474-9422

1 CERTIFICATE OF SERVICE Pursuant to Fed. R. Civ. P. 5(b), I certify that I am an employee of 2 3 MORRIS PETERSON, that I am familiar with the firm's practice of collection and processing documents for mailing; that, in accordance therewith, I caused the 4 following document to be deposited with the U.S. Postal Service at Las Vegas, 5 Nevada, in a sealed envelope, with first class postage prepaid, on the date and to 6 the addressee(s) shown below: DEFENDANTS' JOINT UNOPPOSED MOTION 7 FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT 8 9 TO: 10 Marc S. Cwik P. Sterling Kerr Law Offices of P. Sterling Kerr Lewis Brisbois Bisgaard & Smith LLP 11 6385 S. Rainbow Blvd., Ste. 600 2450 St. Rose Parkway, Ste. 120 Las Vegas, Nevada 89118 Email: cwik@lbbslaw.com Henderson, Nevada 89074 12 Email: psklaw@aol.com 13 Attorneys for Defendants CBZ Retirement Attorney for Plaintiffs Solutions, LLC and 14 Cory Zimet David Kahn Wilson Elser 15 Aaron D. Lovaas 300 South Fourth Street, 11th Floor Lovaas & Lehtinen Las Vegas, Nevada 89101 16 6128 West Sahara Avenue Las Vegas, Nevada 89146 Robert J. D'Anniballe, Jr. 17 Pietragallo Gordon Alfano Bosick & James F. Polese Raspanti, LLP Gammage & Burnham, PLC Two North Central, 15th Floor 18 200 Stanton Blvd., Suite 100 Steubenville, Ohio 43952 19 Phoenix, Arizona 85004 Attorneys for Defendants Economic 20 Attorneys for Defendant Pension Concepts, Inc.; ECI Pension Services, LLC; Strategies, IBP, LLC Medalist Pension Advisors, LLC and 21 Kenneth R. Harstein 22 Dated this Hay of Hebruary, 2012.

By: Avalyalls 23 24 25 26 27 28

MORRIS PETERSON ATTORNEYS AT LAW 900 BANK OF AMERICA PLAZA 300 SOUTH FOURTH STREET LAS VEGAS, NEVADA 89101 702/474-9400 FAX 702/474-9422